

90 Merrick Avenue, 9th Floor East Meadow, NY 11554 Phone: 516.296.7000 • Fax: 516.296.7111 www.certilmanbalin.com

ROBERT D. NOSEK OF COUNSEL DIRECT DIAL 516.296.7171 rnosek@certilmanbalin.com

## VIA ELECTRONIC CASE FILING

October 1, 2024

The Honorable Elizabeth S. Stong United States Bankruptcy Judge United States Bankruptcy Court Eastern District of New York 271 Cadman Plaza East Brooklyn, New York 11201

Re: In re: Hui Qin a/ka/ Muk Lam Li, Karl Qin

Chapter 7 Debtor
Case No.: 24-41955-ess

Dear Judge Stong:

We are counsel to Richard J. McCord, Esq. (the "Trustee"), the chapter 7 trustee for the estate of Hui Qin. This letter is in follow up to the Scheduling Order entered by the Court on Monday, September 30, 2024 [ECF Doc. No. 73] (the "Order").

We write to let you know that we had and will have difficulty complying with that part of the Order requiring service on creditors for whom we do not have an e-mail address. The Order requires service to be by overnight mail to be received by October 1, 2024. There are 16 parties in interest on the creditor mailing matrix for which we do not have the e-mail addresses, and none was ever supplied by the Debtor. The issue that raises is that all 16 parties have addresses in China or Chinese territories. We have been advised that overnight delivery to those locations is not possible. Additionally, when we try and process the mailings on an expedited delivery, the cost for each mailing is in excess of \$100 per package. The Debtor's estate currently has no money in it. As such, on behalf of the Trustee, we request an amendment to the Order that will permit us to serve those creditors by first class international mail through the United States Postal Service.

If Your Honor should have any questions or require additional information, please do not hesitate to have a member of chambers contact us.

Thank you.



The Honorable Elizabeth S. Stong United States Bankruptcy Judge October 1, 2024 Page -2-

Respectfully,

/s/ Robert D. Nosek ROBERT D. NOSEK

RDN:ccf

cc:

Richard J. McCord, Esq.

The Court has reviewed the letter from the Chapter 7 Trustee dated October 1, 2024 (ECF No. 74) requesting a modification to the Court's Scheduling Order dated September 30, 2024 (ECF No. 73).

The Court will enter an amended scheduling order providing for service by international first class mail and a November 19, 2024 hearing date.

It is so ordered.

Dated: Brooklyn, New York October 2, 2024



Elizabeth S. Stong United States Bankruptcy Judge

8398816.1